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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JO PATRICIA RABCHEV,

Defendant.

Case No. 2:21-cv-197-CDS-MDC

**THIRD STIPULATION REGARDING
THE EXTENSION OF SCHEDULED
DEADLINES**

This is the Parties' third request for an extension of time under **LR IA 6-1** and **LR 26-3**. On June 13, 2024, the Parties requested to extend the original discovery and case deadlines set on August 29, 2023 (ECF No. 50). The Court granted that extension (ECF No. 51), setting the following deadlines:

- Discovery due by November 7, 2024
- Motions due by January 20, 2025

- Proposed Joint Pretrial Order due by February 19, 2025.

Per LR 26-3, this third stipulation is being made more than 21 days before the scheduled discovery deadline which is March 7, 2025. Good cause exists to grant this third extension. Since the Second extension, the United States has continued to actively serve discovery requests on the Defendant. This is in addition to the previously served discovery requests the Parties served each other since the second extension was granted, the United States additional requests for Admission on Defendant and Defendant has timely responded to said Requests for Admissions. Defendant has also supplemented her document production since the Second extension.

In summary, more time is needed to complete discovery to schedule the depositions of key witnesses for Plaintiff and Defendant. Granting this extension will allow the Parties to continue their efforts while minimizing the need for immediate court intervention. Defendant and her husband have returned to the United States from Bulgaria and have been available for their depositions, but additional time is necessary to schedule their depositions, as well as the deposition of key witness, Ryan Dino of the Internal Revenue Service.

Undersigned counsel for the parties spoke at length February 5, 2025, regarding the outstanding discovery needs in this case and agreed to the six month extension of time as set forth herein including, but not limited to, resolution of any discovery disputes.

In addition, the Parties have continued to attempt to engage in settlement negotiations. Although a settlement was not reached, the Parties are still open to discussing a mutually agreeable resolution to this case.

For the above reasons, and for good cause shown, the Parties therefore seek that the current deadlines, as stated in the Court's scheduling order, ECF No. 54, be extended by six months, and modified as reflected in the table below:

Deadline	Previous	Modified
Fact Discovery Deadline	March 7, 2025	September 7, 2025
Dispositive Motion Deadline	May 20, 2025	November 20, 2025
Pretrial Order	May 20, 2025	December 2, 2025

The Parties request a six month extension because, if they cannot resolve the discovery disputes, they plan to file a “Stipulation Regarding Discovery Dispute” as outlined in this Court’s Standing Orders. The Parties anticipate that involving the Court may take time, and once the discovery is received, the United States and Defendant will need additional time to review the materials before proceeding with the depositions of the Rabchevs, as well as depositions of USA’s key witnesses.

CONCLUSION

The Parties request that the Court grant the third stipulated extension concerning discovery deadlines and enter an order consistent with the proposed changes to the current schedule. A proposed order reflecting those proposed changes to the schedule is attached. Respectfully submitted this 14th February, 2025.

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/s/ S. Don Bennion, Esq._____

/s/Khashayar Attaran, Esq._____

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IT IS SO ORDERED.


U.S. MAGISTRATE JUDGE

Date: February 18, 2025